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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

NICHOLAS SHATLAW,

Petitioner,

v.

SUSAN WASHBURN,

Respondent.

Case No. 2:19-cv-01496-AA

DECLARATION OF KRISTEN E. BOYD IN
SUPPORT OF UNOPPOSED MOTION FOR
JOINT REVISED SCHEDULING ORDER

I, Kristen E. Boyd, declare:

1. I am an attorney licensed to practice law in the State of Oregon and a Senior Assistant Attorney General for the State of Oregon.
2. I am counsel for respondent in the above-captioned case.
3. By the accompanying motion, the parties respectfully seek leave to revise the scheduling order to allow petitioner to file an amended petition in order to better focus the legal issues and promote efficiency and judicial economy.

4. In light of the above, the parties propose that the scheduling order be revised as follows: respondent to file the exhibits by **April 3, 2020**. Petitioner would thereafter have until **June 2, 2020** to file an amended petition. Respondent would then have until **August 3, 2020** to file the response and answer. Petitioner would have until **September 30, 2020** to file the brief in support. The parties may seek leave to file additional replies and sur-replies, if needed.

5. Respondent agrees that the statute of limitations shall be tolled from the date petitioner filed the federal habeas petition, September 10, 2019, until the date respondent files the record.

6. I communicated with petitioner's counsel, Thomas J. Hester, and he jointly agrees that due to the nature of this case, the above set-forth Revised Scheduling Order would be appropriate.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 23, 2020.

s/ Kristen E. Boyd
KRISTEN E. BOYD
Senior Assistant Attorney General